

JTW: 09.03.2020
CA/CG
USAO#2020R00615

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**ALTONIA MANLEY,
ABDUL PARKER,
and**

[REDACTED]

Defendants.

CRIMINAL NO. _____

**(Conspiracy to Distribute and
Possess with Intent to Distribute
Controlled Substances, 21 U.S.C.
§ 846; and Forfeiture, 21 U.S.C.
§ 853, 28 U.S.C. § 2461(c))**

UNDER SEAL

INDICTMENT

COUNT ONE

Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances

The Grand Jury for the District of Maryland charges:

From a date no later than September 1, 2019 and continuing through at least October 30, 2019, in the District of Maryland, the defendants,

**ALTONIA MANLEY,
ABDUL PARKER,
and**

[REDACTED],

did knowingly combine, conspire, confederate, and agree with persons known and unknown to the Grand Jury to distribute and possess with the intent to distribute a mixture or substance containing cocaine, a Schedule II controlled substance.

21 U.S.C. § 846; 21 U.S.C. § 841(b)(1)(C)

FORFEITURE

The Grand Jury for the District of Maryland further charges that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the defendants' convictions.

Narcotics Forfeiture

2. Pursuant to 21 U.S.C. § 853(a), upon conviction of an offense in violation of the Controlled Substances Act, as alleged in the Narcotics Count in the Indictment, the defendants convicted of such offenses, shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offenses; and
- b. any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, such offenses.

21 U.S.C. § 853
21 U.S.C. § 846
18 U.S.C. § 2461

Robert K. Hur
United States Attorney

A TRUE BILL:

Foreperson

Date